

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RIVERBANK,

Plaintiff,

v.

M/V ROCK A BYE et al.,

Defendants.

CASE NO. 2:18-cv-00387-RSM

**STIPULATED MOTION FOR
AN ORDER MODIFYING
DEADLINES**

Plaintiff/Counterclaim Defendant RiverBank, by and through its counsel of record, and Defendants/Counterclaim Plaintiffs James Spurgetis and Debra A. Hieber, by and through their counsel of record, hereby stipulate and agree to the entry of an order modifying the deadlines for filing motions related to discovery, completing discovery, and the deadline to file dispositive motions that are set forth in Dkt. #48, as previously modified by the Order Modifying Discovery Deadlines in Dkt. #67, as follows:

Deadline for filing motions related to discovery: November 22, 2019

Discovery completed by: November 29, 2019

All dispositive motions must be filed by: December 13, 2019

The parties stipulate and agree that they have been pursuing discovery diligently in this matter. The extension is needed because the parties have reached a settlement as to terms and are working toward consummating the settlement. In the event that the settlement is not consummated, the parties wish to preserve the ability and time to depose certain individuals. The

STIPULATED MOTION FOR
AN ORDER MODIFYING
DEADLINES: 1
CASE NO. 2:18-cv-00387-RSM

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

11/1/19

1 extension of the requested deadlines accomplishes this purpose. Accordingly, the parties submit
2 that good cause exists to modify these three deadlines. The parties do not request the
3 modification of any other deadlines.

4 Based on the foregoing, the parties request that the Order Setting Trial Date and Related
5 Dates (Dkt. # 48), as modified by the Order Modifying Discovery Deadlines (Dkt. #67), be
6 modified as set forth above. A proposed order has been submitted with this Motion.

7 DATED this 1st day of November, 2019.

8
9 LUKINS & ANNIS, P.S.

10
11 By /s/ Trevor R. Pincock

12 TREVOR R. PINCOCK
13 WSBA #36818
CHARLES HAUSBERG
WSBA #50029

14 Attorneys for Defendants

15 WITHERSPOON KELLEY

16 By /s/ Shelley N. Ripley

17 SHELLEY N. RIPLEY, WSBA # 28901
18 PAMELA D. COMBO, WSBA #53102

19 Attorneys for Plaintiff
20
21
22
23
24
25
26

STIPULATED MOTION FOR
AN ORDER MODIFYING
DEADLINES: 2
CASE NO. 2:18-cv-00387-RSM

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

11/1/19

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RIVERBANK,

Plaintiff,

v.

M/V ROCK A BYE et al.,

Defendants.

CASE NO. 2:18-cv-00387-RSM

**[PROPOSED]
STIPULATED ORDER MODIFYING
DEADLINES**

THIS MATTER came before the Court upon the Stipulated Motion of all parties for an Order Modifying Deadlines, and it appearing from the Motion and records of this Court that good cause exists for modifying the deadlines,

THEREFORE, IT IS ORDERED that the Order Setting Trial Date and Related Dates (Dkt. # 48), as previously modified by the Order Modifying Discovery Deadlines in Dkt. #67, is modified to reflect the following three deadline changes:

Deadline for filing motions related to discovery: November 22, 2019

Discovery completed by: November 29, 2019

ORDER MODIFYING
DEADLINES: 1
CASE NO. 2:18-cv-00387-RSM

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

11/1/19

All dispositive motions must be filed by:

December 13, 2019

DATED this ____ day of November, 2019.

THE HONORABLE RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by

LUKINS & ANNIS, P.S.

By /s/ Trevor R. Pincock
TREVOR R. PINCOCK
WSBA #36818
CHARLES HAUSBERG
WSBA #50029

Attorneys for Defendants

WITHERSPOON KELLEY

By /s/ Shelley N. Ripley
SHELLEY N. RIPLEY, WSBA # 28901
PAMELA D. COMBO, WSBA #53102

Attorneys for Plaintiff

ORDER MODIFYING
DEADLINES: 2
CASE NO. 2:18-cv-00387-RSM

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

11/1/19

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of November, 2019, I caused to be served a true and correct copy of the forgoing by the method indicated below, and addressed to the following counsel of record as follows:

Casey Bruner
Pamela D. Combo
Shelley N. Ripley
Michael D. Currin
WITHERSPOON KELLEY
422 W. Riverside Ave, Ste 1100
Spokane, WA 99201

☐ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (FAX)
☒ Via email - ECF

cmb@witherspoonkelley.com
pdc@witherspoonkelley.com
snr@witherspoonkelley.com
mdc@witherspoonkelley.com

Attorneys for Riverbank


MARIANNE LOVE, Legal Assistant

STIPULATED MOTION FOR
AN ORDER MODIFYING
DEADLINES: 3
CASE NO. 2:18-cv-00387-RSM

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

11/1/19